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6

7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9 MARLAND JACKSON, MOTHER (Wilma
10 Banks),

11 Plaintiff,

12 v.

13 STATE OF NEVADA, DOC, *et al.*,

14 Defendants.

Case No. 2:23-cv-02015-CDS-BNW

15

16 **STIPULATION AND PROPOSED
17 ORDER TO AMEND COMPLAINT
18 (FIRST REQUEST)**

19 Plaintiff, Marland Jackson, Mother (Wilma Banks) ("Plaintiff"), through her attorney,
20 C. Benjamin Scroggins, Esq. of Law Firm of C. Benjamin Scroggins, and Interested Party
Nevada Department of Corrections, through their attorneys of record, Aaron D. Ford, Esq.,
and Victoria C. Corey, Deputy Attorney General, of the Office of the Attorney General,
respectfully submit the following Stipulation to Amend Complaint and establishment of
the deadlines to file a notice of acceptance of service and responsive pleading as follows:

21 1. Plaintiff may file an Amended **Complaint no later than sixty (60) days**
22 **from the date of the Court's order approving this stipulation;**

23 2. **Within twenty-one (21) days of the filing of the Amended Complaint,**
24 the OAG shall file a notice of acceptance of service of process on behalf of those Defendants
25 named in the Amended Complaint from whom OAG has received requests for
26 representation;

27 3. As to any of the named defendants for whom the OAG cannot accept service,
28 the OAG shall file under seal, with service to Plaintiff's counsel, the last known address(es)

1 of those defendant(s) for whom it has such information. **Any such disclosure is for**
2 **attorney's eyes only;**

3 4. If service cannot be accepted for any of the named defendant(s), service must
4 be attempted as under FRCP 4; and

5 5. Any defendant for whom the OAG accepts service of process shall file and
6 serve a responsive pleading to the Amended Complaint **within sixty (60) days of the**
7 **filings of the Amended Complaint.**

8 By entering into this stipulation, none of the parties waive any rights or defenses
9 they have under statute, law, or rule with respect to Plaintiff's complaint.

10 DATED this 4th day of March, 2024. DATED this 4th day of March, 2024.

11 AARON D. FORD

12 Attorney General

13 By: /s/ C. Benjamin Scroggins By: /s/ Victoria C. Corey
14 C. BENJAMIN SCROGGINS (Bar No. 7902) VICTORA C. COREY (Bar No. 16364)

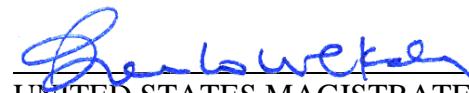
15 Attorney for Plaintiff

Deputy Attorney General

16 Attorneys for Interested Party

17 **ORDER**

18 IT IS SO ORDERED.

19 
20 UNITED STATES MAGISTRATE JUDGE

21 DATE: 3/7/2024